

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

YUKIO KUSADA,)	
Plaintiff)	
)	
vs.)	Civil Action
)	No.: Civil Action No.: 05-30043-MAP
)	
NORTHFIELD MOUNT HERMON)	
SCHOOL,)	
FRANCIS MILLARD and)	
MICHAEL ATKINS,)	
Defendants)	
)	
v.)	
)	
TAKERU KUSADA)	
Third Party Defendant)	

**JOINT MOTION FOR EXTENSION OF TIME
TO FILE JOINT PRETRIAL CONFERENCE MEMORANDUM**

The parties in the above captioned matter hereby request an extension of time for filing the Joint Pretrial Conference Memorandum from October 19, 2006 until October 24, 2006. As grounds therefore, the parties state the following:

1. Attorneys for the parties attempted to complete expert depositions by the end of September but scheduling difficulties resulted in two expert depositions taking place within the last two weeks.
2. On Tuesday, October 10, 2006, attorneys for both parties traveled to Muncie, Indiana so that counsel for the defendant could depose plaintiff's expert witness, Marilyn Buck.

3. The deposition of Dr. Buck took place on Wednesday, October 11, 2006.
4. On October 11, 2006, counsel returned to Massachusetts.
5. On Wednesday, October 18, 2006, counsel for both parties traveled to Albuquerque, New Mexico so that counsel for the defendant could depose plaintiff's expert witness, James Isham.
6. The deposition of James Isham took place on Thursday, October 19, 2006.
7. Travel delays resulted in Plaintiff's counsel returning home late at night on Friday, October 20, 2006, and Defendant's counsel returning on Saturday October 21, 2006.
8. For the purpose of taking expert depositions in this case, counsel for both parties have been out of the state for much of the two weeks preceding the October 19, 2006 deadline for filing the Joint Pretrial Conference Memorandum and therefore have been unable to complete the Pretrial Conference Memorandum.
9. Counsel have worked cooperatively and aggressively to complete the work necessary to prepare the Pre- Trial Memorandum.

Wherefore, counsel for both parties respectfully request that their Joint Motion for Extension of Time to File Pretrial Conference Memorandum be allowed.

By His Attorneys

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